

GIBSON, DUNN & CRUTCHER LLP
Orin Snyder (*pro hac vice*)
osnyder@gibsondunn.com
200 Park Avenue
New York, NY 10166-0193
Telephone: 212.351.4000
Facsimile: 212.351.4035

Kristin A. Linsley (SBN 154148)
klinsley@gibsondunn.com
Martie Kutscher (SBN 302650)
mkutscherclark@gibsondunn.com
555 Mission Street, Suite 3000
San Francisco, CA 94105-0921
Telephone: 415.393.8200
Facsimile: 415.393.8306

Attorneys for Defendant Facebook, Inc.,

GIBSON, DUNN & CRUTCHER LLP
Deborah Stein (SBN 224570)
dstein@gibsondunn.com
333 South Grand Avenue
Los Angeles, CA 90071-3197
Telephone: 213.229.7000
Facsimile: 213.229.7520

Joshua S. Lipshutz (SBN 242557)
jlipshutz@gibsondunn.com
1050 Connecticut Avenue, N.W.
Washington, DC 20036-5306
Telephone: 202.955.8500
Facsimile: 202.467.0539

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

IN RE: FACEBOOK, INC. CONSUMER
PRIVACY USER PROFILE LITIGATION,

This document relates to:

ALL ACTIONS

CASE NO. 3:18-MD-02843-VC

**DECLARATION OF ALEXANDER
SWANSON IN SUPPORT OF FACEBOOK,
INC.'S UNOPPOSED MOTION FOR
ENLARGEMENT OF TIME TO FILE
STATEMENT IN SUPPORT OF SEALING**

I, Alexander P. Swanson, hereby declare as follows:

1. I am an associate at the law firm of Gibson, Dunn & Crutcher LLP, counsel of record for Facebook, Inc. (“Facebook”) in the above-captioned matter. I am a member in good standing of the State Bar of California. I submit this declaration in support of Facebook’s Unopposed Motion For An Enlargement Of Time To File Statement In Support Of Sealing. I make this declaration on my own knowledge, and I would testify to the matters stated herein under oath if called upon to do so.

2. On December 8, 2021, Special Master Daniel Garrie issued an Order Regarding Production of ADI Related Documents (the “Order”). The Special Master’s Order and exhibits include the names of Facebook’s consulting experts, which the Court has previously sealed. The Order attaches as exhibits over 600 pages of briefing and other documents submitted by the parties, which include over 350 pages of materials that Facebook produced as Confidential or Highly Confidential – Attorneys’ Eyes Only under the Protective Order, Dkt. 122, as well as additional unredacted versions of documents the Court has already ordered sealed in this action.

3. Because of the large volume and sensitivity of these materials, Facebook requires more than the seven days provided by the local rules to conduct a thorough review of these materials and prepare a statement and declaration in support of sealing—particularly given the upcoming holidays.

4. On December 15, 2021, I contacted Plaintiffs’ Counsel to inquire whether they would oppose Facebook’s request for an enlargement of time by seven business days to respond to Plaintiffs’ Administrative Motion To Consider Whether Another Party’s Material Should Be Sealed (Dkt. 765), and whether they would agree to a stipulation granting the enlargement of time. Plaintiffs’ counsel informed me that they do not oppose Facebook’s request for an enlargement of time by seven business days, but would not stipulate to the extension.

5. Attached as **Exhibit A** is a true and correct copy of my correspondence with Plaintiffs’ Counsel concerning Facebook’s request for an enlargement of time.

6. The parties have not previously sought to enlarge the time for Facebook to submit materials in support of sealing in regard to Plaintiffs' Administrative Motion To Consider Whether Another Party's Material Should Be Sealed.

7. Granting an enlargement of time by seven business days will not affect the schedule of the action.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on December 18, 2021 in Los Angeles, California.



Alexander P. Swanson